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10 Attorneys for Defendant
HEY FAVOR, INC.

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

14 SAN FRANCISCO DIVISION

15 JANE DOE,

16 Plaintiff,

17 v.

18 HEY FAVOR, INC., FULLSTORY, INC.,
19 META PLATFORMS, INC., TIKTOK, INC.,
and BYTEDANCE INC.,

20 Defendants.

Case No. 3:23-cv-00059-WHO

**STIPULATION AND ORDER (1)
EXTENDING TIME TO RESPOND
TO COMPLAINT,
(2) SETTING BRIEFING
SCHEDULE ON DEFENDANTS'
ANTICIPATED MOTIONS TO
DISMISS, AND (3) CONTINUING
INITIAL CASE MANAGEMENT
CONFERENCE**

Pursuant to Civil Local Rules 6-1(a)-(b) and 7-12, Plaintiff and Defendants Hey Favor, Inc., FullStory, Inc., Meta Platforms, Inc., TikTok Inc., and ByteDance Inc. (collectively, “Defendants”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, Plaintiff filed her Complaint on January 5, 2023, and Defendants were served on January 9, 2023;

WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), Defendants’ original deadline to respond to the Complaint was January 30, 2023;

WHEREAS, on January 27, 2023, the parties stipulated pursuant to Civil Local Rule 6-1(a) to extend the deadline to respond to the complaint to March 16, 2023 (ECF No. 26);

WHEREAS, on January 27, 2023, the Court scheduled an initial case management conference for April 4, 2023 (ECF No. 29);

WHEREAS, each Defendant currently intends to file a motion to dismiss, and counsel for the parties met and conferred by email on February 22 and February 24, 2023 regarding a briefing schedule for those anticipated motions to dismiss, taking into account the complexities of the issues in this action;

WHEREAS, the parties agree that extending the deadline for Defendants to file their anticipated motions to dismiss or otherwise respond to the Complaint and setting the briefing schedule on any motions to dismiss will facilitate the efficient resolution of any dispute and conserve judicial resources;

WHEREAS, the parties agree that good cause exists for a continuance of the Case Management Conference to allow the parties to brief the anticipated motions to dismiss the Complaint, which may impact the scope of the issues to be discussed at the Case Management Conference and would conserve the parties’ and the Court’s resources;

NOW, THEREFORE, the parties hereby stipulate and agree, subject to the approval of the Court that:

1. Each Defendant shall file its motion to dismiss or otherwise respond to the Complaint on or before March 30, 2023;
2. Plaintiff shall file her oppositions to Defendants’ motions to dismiss on or before

May 30, 2023;

3. Each Defendant shall file its reply in support of its motion to dismiss on or before June 29, 2023.

4. The initial Case Management Conference currently scheduled for April 4, 2023 shall be continued to a date after the Court's ruling on the anticipated motions to dismiss.

Dated: March 7, 2023

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Attorneys for Defendant
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Dated: March 7, 2023

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COVINGTON & BURLING LLP

Dated: March 7, 2023

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Dated: March 7, 2023

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Dated: March 7, 2023

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Attorneys for Plaintiff
JANE DOE

ECF ATTESTATION

I, Tiffany Cheung, am the ECF User whose identification and password are being used to file the foregoing STIPULATION AND [PROPOSED] ORDER (1) EXTENDING TIME TO RESPOND TO COMPLAINT, (2) SETTING BRIEFING SCHEDULE ON DEFENDANTS' ANTICIPATED MOTIONS TO DISMISS, AND (3) CONTINUING INITIAL CASE MANAGEMENT CONFERENCE. Pursuant to L.R. 5-1(h)(3) regarding signatures, I, Tiffany Cheung, attest that concurrence in the filing of this document has been obtained.

Dated: March 7, 2023

MORRISON & FOERSTER LLP

By: /s/ Tiffany Cheung

Tiffany Cheung


ORDER

Pursuant to the Parties' stipulation, the Court hereby orders as follows:

1. Each Defendant shall file its motion to dismiss or otherwise respond to the Complaint on or before March 30, 2023;
2. Plaintiff shall file her oppositions to Defendants' motions to dismiss on or before May 30, 2023;
3. Each Defendant shall file its reply brief in support of its motion to dismiss on or before June 29, 2023;
4. The initial Case Management Conference currently scheduled for April 4, 2023 is VACATED. After this Court rules on Defendants' motions to dismiss, the Court will enter an order setting a date for the initial Case Management Conference.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: March 8, 2023



Honorable William H. Orrick
United States District Judge

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HEY FAVOR, INC.

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20 Defendants.
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Case No. 3:23-cv-00059-WHO

**DECLARATION OF TIFFANY
CHEUNG IN SUPPORT OF
STIPULATION AND [PROPOSED]
ORDER (1) EXTENDING TIME TO
RESPOND TO COMPLAINT,
(2) SETTING BRIEFING
SCHEDULE ON DEFENDANTS'
FORTHCOMING MOTIONS TO
DISMISS, AND (3) CONTINUING
INITIAL CASE MANAGEMENT
CONFERENCE**

1 I, Tiffany Cheung, hereby declare as follows:

2 1. I am a partner with the law firm of Morrison & Foerster LLP, counsel of record for
3 Defendant Hey Favor, Inc. in this action. I am a member of good standing in the Bar of the State
4 of California, and I am admitted to practice before this Court. I have personal knowledge of
5 matters set forth in this declaration, and if called upon to do so, I would testify competently to
6 them.

7 2. Plaintiff filed her Complaint on January 5, 2023.

8 3. On January 27, 2023, the parties stipulated pursuant to Civil Local Rule 6-1(a) to
9 extend the deadline to respond to the complaint to March 16, 2023 (ECF No. 26).

10 4. On January 27, 2023, the Court issued a Case Management Order, setting the initial
11 Case Management Conference for April 4, 2023 at 2:00 PM (ECF No. 29).

12 5. Counsel for the parties have met and conferred regarding a briefing schedule for
13 Defendants' anticipated motions to dismiss and the timing of the Case Management Conference.

14 6. Counsel for the parties have agreed that it would be appropriate to continue the
15 April 4, 2023 Case Management Conference until after the resolution of Defendants' anticipated
16 motions to dismiss to conserve the parties' and the Court's resources.

17 7. The parties have not previously requested any change to the date of the Case
18 Management Conference or any other deadlines set by the Court. It is anticipated that this request
19 will not significantly impact the schedule of this action.

20
21 I declare under penalty of perjury of the laws of the United States that the foregoing is
22 true and correct.

23 Executed this 7th day of March, 2023 in Oakland, California.

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25 /s/ Tiffany Cheung
Tiffany Cheung
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